

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: Janice Travis)
)
) Case No: 19 B 01961
) Judge: Cleary
) Chapter 13
Debtor)
)

NOTICE OF MOTION

Served upon the following parties electronically:

Office of United States Trustee, Dirksen Federal Building, 219 S. Dearborn, St., Room 873, Chicago, IL 60604

Trustee: Marilyn O. Marshall, 224 S. Michigan Ste. 800, Chicago, IL 60604

and served upon the following parties via U.S. Mail:

Debtor: Janice Travis, 359 Concord Dr, Chicago Heights, IL 60411

See Attached Service List

PLEASE TAKE NOTICE that on June 8, 2020 at 1:30 p.m.,

or as soon thereafter as I may be heard, I shall appear before the Honorable Judge

Cleary, or any other Bankruptcy Judge presiding in his place in Courtroom 644 of the

Dirksen Federal Building, 219 S. Dearborn St., Chicago, Illinois, on the attached Motion

to Modify Plan, and shall request that the attached Order be entered, at which time you

may appear if so desired. If any party objects to the attached motion and request that the

motion be called in Court, the party must file a Notice of objection no later than two

business days before the presentment date of this motion.

PROOF OF SERVICE

I, The undersigned, an attorney, hereby certify that a copy of this notice was served electronically or mailed to the above persons, at her respective addresses, postage prepaid, by depositing in the U.S. Mail at 211 W. Wacker Dr., Chicago, IL 60606, before May 18, 2020.

/s/ Angelica Harb

Angelica Harb
Hinds Law, LLC
211 W. Wacker Dr., Ste. 321
Chicago, IL 60606
800-695-7674

0752-1

Case 19-01961

Northern District of Illinois

Eastern Division

Mon Mar 9 18:23:52 CDT 2020

Cab Serv

90 Barney Dr

Joliet, IL 60435-6402

(p)CAVALRY PORTFOLIO SERVICES LLC

500 SUMMIT LAKE DR

STE 400

VALHALLA NY 10595-2322

Comcast

P.O. Box 4200

Brownsville, TX 78523-4200

Credit Acceptance Corp

22505 W 12 Mile Rd Ste 3000

Southfield, MI 48034

Directv, LLC

by American InfoSource as agent

4515 N Santa Fe Ave

Oklahoma City, OK 73118-7901

ERC/Enhanced Recovery Corp

Attn: Bankruptcy

8014 Bayberry Road

Jacksonville, FL 32256-7412

Ffcc-Colombus Inc

1550 Old Henderson Rd St

Columbus, OH 43220-3626

Harris & Harris

111 W Jackson Blvd

Suite 400

Chicago, IL 60604-4135

JP Morgan Chase Bank

PO Box 182051

Columbus, OH 43218-2051

JP Morgan Chase Bank NA

P.O. Box 901032

Fort Worth, TX 76101-2032

JPMorgan Chase Bank, National Association

P.O. Box 29505 AZ1-1191

Phoenix, AZ 85038-9505

PLS Loan Store

1427 W 127th St

Calumet Park, IL 60827-6019

RJM Acquisitions LLC

575 Underhill Blvd Ste 224

Syosset, NY 11791-3416

Sprint

200 W Monroe St

Chicago, IL 60606-5137

Wells Fargo Bank, N.A. Trustee (See 410)

c/o Specialized Loan Servicing LLC

8742 Lucent Blvd, Suite 300

Highlands Ranch, Colorado 80129-2386

Wells Fargo Home Mortgage

Attn: Bankruptcy

Po Box 10335

Des Moines, IA 50306-0335

Angelica Harb

Hinds Law LLC

211 W Wacker Dr Suite 321

Chicago, IL 60606-1217

Angelica Harb

Law Office of Jason Blust, LLC

211 W. Wacker Dr., Ste. 300

Chicago, IL 60606-1390

Janice Travis

359 Concord Dr

Chicago Heights, IL 60411-4034

Marilyn O Marshall

224 South Michigan Ste 800

Chicago, IL 60604-2503

Patrick S Layng

Office of the U.S. Trustee, Region 11

219 S Dearborn St

Room 873

Chicago, IL 60604-2027

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Cavalry Investments LLC

P.O. Box 27288

Tempe, AZ 85282

(d)Cavalry Portfolio Services LLC

P.O. Box 27288

Tempe, AZ 85282

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) JPMorgan Chase Bank, National Association

(u) Specialized Loan Servicing LLC

End of Label Matrix	
Mailable recipients	23
Bypassed recipients	2
Total	25

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: Janice Travis)
Debtor) Case No: 19 B 01961
) Judge: Cleary
) Chapter 13
)**

MOTION TO MODIFY PLAN

Now comes Janice Travis (hereinafter referred to as “Debtor”), by and through her attorneys, and moves this Honorable Court for entry of an Order Modifying Plan, pursuant to section 1329 of the bankruptcy code, and in support thereof, respectfully represents as follows:

1. On January 23, 2019, the Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code.
2. This Honorable Court confirmed the Debtor’s Chapter 13 plan on April 22, 2019. The confirmed plan called for payments of \$280.00 for 36 months, paying unsecured creditors 100% on their claims.
3. The Debtor’s confirmed plan calls for the Trustee to pay JP Morgan Chase(Debtor’s lienholder) for her 2008 Ford Fusion. JP Morgan Chase filed a secured proof of claim on February 15, 2019 in the amount of \$2,703.05. Debtor’s 2008 Ford Fusion was involved in a total loss accident. This Court authorized State Farm to distribute insurance proceeds on March 9, 2020 to pay JP Morgan Chase in full to pay off their lien.
4. Debtor’s counsel spoke with representatives from JP Morgan Chase that stated they will only amend their proof of claim with an order from this Court. Debtor is

requesting that the Trustee stop any further payments to JP Morgan Chase as their claim has already been paid by Debtor's insurance.

WHEREFORE, Debtor prays that this Honorable Court enter an Order for the following relief:

1. That the Trustee cease any further payments to JP Morgan Chase; and
2. For such other relief as this Court deems proper under the circumstances.

Respectfully submitted,

/s/ Angelica Harb
Angelica M. Harb
Hinds Law, LLC
211 W. Wacker Dr., Ste. 321
Chicago, IL 60606
800-695-7674